



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

F. #2016R02185

July 11, 2019

By FedEx and ECF

Anthony Ricco  
20 Vesey Street, Suite 400  
New York, New York 10007

Re: United States v. Donville Inniss  
Criminal Docket No. 18-134 (S-1)(KAM)

Dear Mr. Ricco:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-referenced matter. This submission supplements the government's earlier disclosures of August 23, 2018, and October 16, 2018, to prior counsel and which you have since received and the May 30, 2019, disclosure to you. With this production, the government renews its request for reciprocal discovery from the defendant.

Enclosed with this letter is a disc that contains photos relating to ICBL and BIDC, Bates-numbered DOJ-CDL-00051256 – 51264; Wells Fargo records relating to the defendant, Kyfi Corp. and ICBL, Bates-numbered DOJ-CDL-00051265 – 51278; and Google account information relating to Alex Tasker, Bates-numbered DOJ-CDL-00051252 – 51255.<sup>1</sup>

Per Federal Rules of Evidence 803(6) and 902(11), where affidavits concerning the authenticity of the records are included herein for business records, the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

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<sup>1</sup> Pursuant to the August 23, 2018 Court order and signed by counsel, the defendant and the government, you are required to safeguard any personally identifying information that has not been redacted.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Sylvia Shweder  
Sylvia Shweder  
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Enclosure

cc: Clerk of the Court (KAM) (by ECF) (without enclosure)